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October 25, 1999

REC'D TN  
RECEIVED  
Guy M. Hicks  
General Counsel  
199 OCT 25 PM 3 49  
EXECUTIVE SECRETARY

VIA HAND DELIVERY

David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Petition for Arbitration of ITC^DeltaCom Communications, Inc. with BellSouth Telecommunications, Inc. pursuant to the Telecommunications Act of 1996*  
Docket No. 99-00430

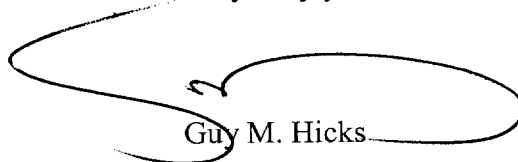
Dear Mr. Waddell:

Enclosed are the original and thirteen copies of rebuttal testimony on behalf of BellSouth Telecommunications, Inc.:

David A. Coon  
Keith Milner  
Alphonso J. Varner  
William Taylor  
Ronald M. Pate  
Daonne Caldwell

Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,



Guy M. Hicks

GMH:ch  
Enclosure

FILE

CERTIFICATE OF SERVICE

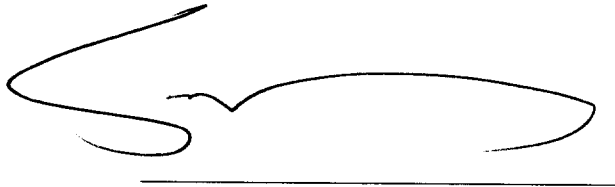
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**FILE**



1

2

**Issue 2, 2(a)(iv) and 2(b)(I): Sub-part (b)(1)**

3

**Pursuant to this definition, should BellSouth be required to**

4

**provide the following and if so, under what conditions and at what**

5

**rate: (1) Operational Support Systems (“OSS”)**

6

7

8

Q. MR. THOMAS (PAGES 3-4) AND MR. WOOD (PAGE 11) ALLEGE

9

THAT BELL SOUTH IS NOT PROVIDING NONDISCRIMINATORY

10

ACCESS TO ITS OPERATIONS SUPPORT SYSTEMS (“OSS”)

11

SYSTEMS AND DATABASES. DO YOU AGREE?

12

13

A. No. BellSouth provides nondiscriminatory electronic interfaces to its

14

OSS for Competitive Local Exchange Carriers (“CLECs”). The

15

interfaces provided by BellSouth allow CLECs to perform the functions

16

of pre-ordering, ordering, provisioning, maintenance and repair, and

17

billing for resale services in substantially the same time and manner as

18

BellSouth does for itself; and, in the case of unbundled network

19

elements, provide a reasonable competitor with a meaningful

20

opportunity to compete. BellSouth is not obligated to provide CLECs

21

with any additional access to its OSS.

22

23

Q. ON PAGE 13 OF HIS TESTIMONY, MR. ROZYCKI STATES THAT

24

“BELL SOUTH'S OSS CURRENTLY DOES NOT WORK”. MR. WOOD

1 STATES ON PAGE 8 THAT "THE EXISTING OSS EMPLOYED BY  
2 BELLSOUTH IS NOT WORKABLE." DO YOU AGREE?

3  
4 A. No. If the electronic interfaces to BellSouth's OSS did not work, then  
5 CLECs would not use them. The supporting data, which is also  
6 provided in my direct testimony, reflects the use of the electronic  
7 interfaces to BellSouth's OSS and their continued growth. As a point of  
8 reference, in August 1998, a total of 159,543 local service requests  
9 (LSRs) were processed by BellSouth. From that total, 118,257 (74.1%)  
10 were submitted manually and 41,286 (25.9%) were submitted  
11 electronically. By contrast, in September 1999, LSR total submissions  
12 grew by 21% to 192,564. In conjunction with experiencing tremendous  
13 growth the LSR submissions have shifted to 45.1% (86,816 LSRs)  
14 submitted manually and 54.9% (105,748 LSRs) submitted  
15 electronically. Of particular note is the growth in submissions using the  
16 EDI electronic interface which is the primary interface of choice for  
17 ITC^DeltaCom. In August 1998, BellSouth processed 8,659 LSRs  
18 received via EDI. Between March 1999 and August 1999, CLECs  
19 submitted on average 14,760 LSRs via EDI each month. This average  
20 represents a 70% increase. In addition, the combined flow through rate  
21 for the electronic interfaces was 92.1% for September 1999. These  
22 facts strongly suggest that the electronic interfaces to BellSouth's OSS  
23 do in fact work and that the CLEC community as a whole has found  
24 their deployment to be effective.

1 Q. IS BELLSOUTH REQUIRED TO PERFORM THE INTEGRATION OF  
2 INTERFACES FOR CLECS?

3  
4 A. No. Contrary to the implication in the testimony of Mr. Thomas (pages  
5 3-4), the Federal Communications Commission ("FCC") has not  
6 ordered BellSouth to integrate pre-ordering and ordering interfaces.  
7 There is no requirement in the Telecommunications Act of 1996 or in  
8 any order by the FCC that makes BellSouth responsible for performing  
9 the "integration" of pre-ordering [Local Exchange Navigation System  
10 ("LENS") and Telecommunication Access Gateway ("TAG")], and  
11 ordering (LENS, TAG and EDI), with the CLECs' own OSS systems.  
12 BellSouth provides an integratable, national standard based, machine-  
13 to-machine interface for pre-ordering through TAG. ITC^DeltaCom may  
14 integrate the TAG pre-ordering interface with the EDI ordering interface  
15 and their own internal OSS. The national order standards [EDI and  
16 Common Object Request Brokering Architecture (CORBA)] assume  
17 that the CLECs have their own marketing and sales support system,  
18 and that the CLECs undertake the work to integrate their system with  
19 the ordering standard to generate Local Service Request (LSR). This  
20 allows CLECs to tailor the interfaces and the information received via  
21 the interfaces in the best manner possible to suit their own individual  
22 business needs. Integration is clearly the responsibility of the CLEC.

23  
24 Q. MR. ROZYCKI (PAGE 11) STATES THAT "BELLSOUTH'S  
25 OPERATIONS SUPPORT SYSTEMS ("OSS") CURRENTLY FALL FAR  
26 SHORT OF PROVIDING A COMPETITIVE ALTERNATIVE TO

1 BELL SOUTH'S OWN INTERNAL SYSTEMS". MR. ROZYCKI  
2 FURTHER CLAIMS (PAGE 14) THAT DELTACOM SHOULD NOT BE  
3 REQUIRED TO PAY FOR OSS BECAUSE ITC^DELTACOM "DID NOT  
4 REQUEST A SEPARATE SYSTEM BE CONSTRUCTED FOR IT.  
5 ITC^DELTACOM CONSIDERS IT ACCEPTABLE TO HAVE DIRECT  
6 ACCESS INTO BELL SOUTH'S EXISTING OPERATIONAL SUPPORT  
7 SYSTEMS. BELL SOUTH CHOSE TO CONSTRUCT A SEPARATE  
8 SYSTEM FOR CLECs TO USE FOR PREORDERING, ORDERING,  
9 PROVISIONING, AND MAINTENANCE." PLEASE COMMENT.

10

11 A. ITC^DeltaCom's claim confuses the issues of access, interfaces, and  
12 OSS. The Act at Section 251(c)(3) only requires that BellSouth provide  
13 nondiscriminatory access to network elements, including OSS. First,  
14 ITC^DeltaCom *does* have direct access to BellSouth's existing OSS via  
15 the electronic interfaces, just as BellSouth's retail units access  
16 BellSouth's existing OSS via the interfaces they use. A good example  
17 is the maintenance and repair OSS, TAFI. BellSouth and CLECs can  
18 use the same TAFI interface. As I described in my direct testimony in  
19 response to ITC^DeltaCom's Issue 3(m), the primary difference  
20 between CLEC TAFI and BellSouth TAFI is that CLEC TAFI combines  
21 functionality for both residential and business services, while BellSouth  
22 must use separate TAFI interfaces for its residential and business retail  
23 units.

24

1       What ITC^DeltaCom seems to be claiming is that it should not have to  
2       pay for the electronic interfaces to BellSouth's OSS because it wants to  
3       use the same interfaces used by BellSouth for its retail customers.  
4       First, the Act does not require identical access, but rather non-  
5       discriminatory access. Second, BellSouth does not have a single  
6       system that it uses for its own customers, nor are the systems used by  
7       BellSouth suitable for CLECs. As I discussed in my direct testimony,  
8       BellSouth uses three different systems for ordering: Regional  
9       Negotiation System ("RNS") for residential customers throughout  
10      BellSouth's region; Direct Order Entry ("DOE") for business customers  
11      in Florida, Georgia, North Carolina, and South Carolina; and the  
12      Service Order Negotiation System ("SONGS") for Alabama, Kentucky,  
13      Louisiana, Mississippi, and Tennessee. DOE and SONGS also are  
14      used for types of residential transactions that are not handled by RNS.  
15      Thus, if CLECs were to use the "same interfaces" as BellSouth, they  
16      would have to implement three different interfaces to place orders in  
17      BellSouth's region. There are other problems with ITC^DeltaCom's  
18      suggestion as well. For example, RNS does not support the most basic  
19      types of CLEC resale orders, "switch-as-is" and "switch-with-changes."  
20      Another problem would be industry standards. RNS, DOE, and  
21      SONGS do not follow the industry standards for ordering, and do not  
22      follow the proposals emerging from the Alliance for  
23      Telecommunications Industry Solutions (ATIS). ATIS is a North  
24      American standards body that is leading the development of



1 telecommunications standards, operating procedures, and guidelines  
2 through its sponsored committees and forums. Finally, RNS, DOE, and  
3 SONGS do not support the ordering of UNEs. It is clear that  
4 BellSouth's decision to build electronic interfaces to its OSS for the  
5 CLECs was the correct decision as well as a reasonable one.

6

7 Q. ON PAGE 2 OF HIS TESTIMONY, MR. THOMAS COMPLAINS THAT  
8 EDI DOES NOT ALLOW AN INTERCEPT MESSAGE TO BE PLACED  
9 ON THE SAME LSR AS THE REQUEST FOR THE LOOP WHEN  
10 PERMANENT LOCAL NUMBER PORTABILITY ("LNP") IS NOT  
11 AVAILABLE. IS THIS A PROBLEM?

12

13 Q. No. If the CLEC submits an LSR for LNP or interim number portability,  
14 an intercept message is not needed. The end user's former telephone  
15 number is ported to the CLEC.

16

17 Q. PLEASE EXPLAIN THE SITUATION IN WHICH EDI DOES NOT  
18 ALLOW AN INTERCEPT MESSAGE TO BE PLACED ON THE SAME  
19 LSR AS THE REQUEST FOR THE LOOP.

20

21 A. This situation has nothing to do with number portability, as Mr. Thomas  
22 suggests. Rather, the situation arises when the CLEC submits an LSR  
23 for an unbundled loop via EDI or TAG and the telephone number is  
24 assigned from an NPA/NXX owned by the CLEC. In this case, a

1 request for a referral of calls (intercept message) can not be placed on  
2 the same LSR and submitted electronically to BellSouth.

3

4 Q. IF THE CLEC WANTS TO ADD A REFERRAL OF CALLS  
5 (INTERCEPT MESSAGE) ON AN LSR, WHEN SHOULD THE CLEC  
6 SUBMIT THE LSR FOR THE REFERENCE OF CALLS?

7

8 A. Currently, the CLEC has two options. A subsequent LSR may be  
9 submitted via EDI or TAG for the referral of calls, or the CLEC can  
10 submit the LSR manually. In either case, the order is processed to  
11 ensure that the CLEC receives the services it desires.

12

13 Q. ARE CHANGES BEING MADE TO ALLOW THE LOOP AND  
14 INTERCEPT TO BE PLACED ON THE SAME ELECTRONICALLY  
15 SUBMITTED LSR?

16

17 A. Yes. An enhancement is being made to BellSouth's systems to allow  
18 the loop and the intercept to be ordered electronically on the same  
19 LSR. This enhancement is expected to be available during the first  
20 quarter next year.

21

22 Q. ON PAGE 13 OF HIS TESTIMONY, MR. HYDE STATES THAT  
23 "CURRENTLY BELL SOUTH CANNOT PROCESS 20% TO 25% OF  
24 ITC^DELTACOM'S ORDERS MECHANICALLY". FURTHERMORE,

1 MR. THOMAS STATES, ON PAGE 2 OF HIS TESTIMONY, THAT  
2 "UNFORTUNATELY, 20–25% OF THE ORDERS THAT  
3 ITC^DELTACOM CURRENTLY PLACES VIA EDI ARE NOT YET  
4 ACCEPTED BY BELL SOUTH'S ELECTRONIC SYSTEMS". PLEASE  
5 COMMENT.

6  
7 A. As I explained in direct testimony in response to ITC^DeltaCom's Issue  
8 2(g), nondiscriminatory access does not require that all information and  
9 functions for CLECs be entirely electronic and involve no manual  
10 handling. Many services, primarily complex services, require  
11 substantial manual handling by BellSouth for both CLECs and  
12 BellSouth's retail customers. Thus, nondiscriminatory access to pre-  
13 ordering, ordering, and provisioning functions for CLECs also  
14 legitimately may involve manual processes.

15  
16 The specialized and complicated nature of complex services, together  
17 with their relatively low volume of requests relative to basic exchange  
18 services, renders them less suitable for mechanization, whether for  
19 retail or resale applications. Complex variable processes are difficult to  
20 mechanize, and BellSouth has concluded that mechanizing many  
21 lower-volume complex retail services would be imprudent for its own  
22 retail operations, in that the benefits of mechanization would not justify  
23 the cost. Since the same manual processes are in place for both CLEC

1 and BellSouth retail complex service requests, the processes are  
2 competitively neutral.

3

4 Q MR. THOMAS STATES, ON PAGE 2 OF HIS TESTIMONY, THAT " OF  
5 THE 75-80% OF ITC^DELTACOM'S ORDERS THAT ARE  
6 SUBMITTED ELECTRONICALLY, 62% OF THESE ORDERS FALL  
7 OUT FOR MANUAL HANDLING BY BELL SOUTH." ON PAGE 13 OF  
8 HIS TESTIMONY, MR HYDE SAYS THAT "OF THE 75% TO 85%  
9 THAT ITC^DELTACOM CAN TRANSMIT TO BELL SOUTH  
10 ELECTRONICALLY, MORE THAN 50% REQUIRE MANUAL  
11 INTERVENTION BY BELL SOUTH DUE TO INADEQUACIES IN  
12 BELL SOUTH'S SYSTEMS". PLEASE COMMENT.

13

14 A. EDI is ITC^DeltaCom's chosen electronic ordering interface. In order to  
15 enable CLECs to submit some complex LSRs electronically, rather than  
16 by fax, BellSouth designed the EDI and TAG ordering interfaces to  
17 accept LSRs for four complex services: PBX trunks, Synchronet® (a  
18 private line data service), ISDN Basic Rate Service, and hunting. While  
19 these services may be ordered electronically via EDI and TAG, the  
20 LSRs for these services are designed to fall out for manual handling by  
21 the BellSouth representatives in the Local Carrier Service Center  
22 (LCSC). This "fall out" has nothing to do with any supposed  
23 inadequacies in BellSouth's systems, but results from the fact that the  
24 requested services are complex. After these LSRs are transmitted to

1 BellSouth via EDI, they are handled as if they were faxed LSRs for  
2 complex services. All CLEC LSRs for complex services are handled in  
3 substantially the same time and manner as service requests for  
4 complex services are handled for BellSouth's retail customers. I  
5 discussed the manual handling of CLEC and BellSouth service  
6 requests in my direct testimony in response to ITC^DeltaCom's Issue  
7 2(g).

8  
9 Q. DO YOU AGREE WITH MR HYDE'S AND MR. THOMAS'  
10 ASSESSMENT THAT MORE THAN 50% OF ITC^DELTACOM'S  
11 ORDERS SUBMITTED ELECTRONICALLY FALL OUT FOR MANUAL  
12 HANDLING?

13  
14 A. Yes. I have reviewed ITC^DeltaCom's flow-through data for the last 9  
15 months and, by design, in excess of 50% of the services ordered  
16 electronically by ITC^DeltaCom fell out for manual handling. This  
17 "fallout by design" is because of the nature of the complex orders  
18 ITC^DeltaCom is submitting. When compared with the CLEC  
19 aggregate rate, ITC^DeltaCom's manual fall out rate demonstrates this  
20 fact. The CLEC aggregate rate was 6.9% for September 1999 and  
21 7.9% for the nine-month period January 1999 to September 1999.

22

23 ***Issue 2(a)(i)***  
24 ***Should BellSouth be required to provide a download of RSAG?***

1

2 Q. ON PAGE 5 OF HIS TESTIMONY, MR. THOMAS STATES THAT "THE  
3 FLORIDA PUBLIC SERVICE COMMISSION HAS ALREADY  
4 ORDERED THE PRODUCTION OF REGIONAL STREET ADDRESS  
5 GUIDE ("RSAG")". PLEASE COMMENT.

6

7 A. The Commission Order issued in Florida was interpreting an existing  
8 interconnection agreement and, thus, has no bearing on the issue in  
9 this proceeding. The conclusion reached in Florida was based on the  
10 provisions of the Interconnection Agreement of BellSouth and the CLEC  
11 involved. The Commission's decision did not establish what BellSouth  
12 is required to do under the Telecommunications 1996 Act of 1996 which  
13 is the issue in this arbitration dispute.

14

15 Q. ON PAGE 5 OF MR. THOMAS' TESTIMONY, HE STATES THAT "AN  
16 ELECTRONIC DOWNLOAD OF THE RSAG DATABASE WHICH  
17 CONTAINS ADDRESS AND FACILITY AVAILABILITY INFORMATION,  
18 WILL ALLOW ITC^DELTACOM TO INCORPORATE THIS  
19 INFORMATION INTO ITC^DELTACOM'S BACK OFFICE SYSTEMS  
20 TO CHECK VALIDITY OF THE CUSTOMER'S ADDRESS, JUST AS  
21 BELLSOUTH'S SYSTEMS USE THE RSAG DATABASE TO CHECK  
22 BELLSOUTH'S ORDERS. WITH THIS INFORMATION,  
23 ITC^DELTACOM WILL BE ABLE TO . . . DEVELOP A MORE  
24 INTEGRATED PROCESS." PLEASE COMMENT.

25

1 A. BellSouth provides nondiscriminatory access to the Regional Street  
2 Address Guide ("RSAG") by giving CLECs real time access to address  
3 validation through the LENS and TAG pre-ordering interface. BellSouth  
4 is not obligated to provide a download of the RSAG.

5  
6 As pointed out in my direct testimony, CLECs such as ITC^DeltaCom  
7 that make the business decision to use such interfaces, can integrate  
8 the TAG pre-ordering interface with the TAG ordering interface or the  
9 Electronic Data Interexchange ("EDI") ordering interface. As stated  
10 previously, EDI is the primary interface of choice for ITC^DeltaCom.  
11 CLECs can integrate these interfaces with their own internal OSS.  
12 Integration provides CLECs with the ability to manipulate the data  
13 obtained via the TAG pre-ordering interface. This includes the ability to  
14 check address validity in RSAG.

15  
16 Q. ON PAGE 24 OF HIS TESTIMONY, MR. WOOD STATES THAT  
17 "ITC^DELTACOM PROPOSES THAT BELLSOUTH WILL TRANSMIT  
18 A SUBSET OF THE RSAG TO ITC^DELTACOM ON A DAILY BASIS  
19 AT NO CHARGE". FURTHERMORE, MR ROZYCKI STATES ON  
20 PAGE 13 OF HIS TESTIMONY THAT "BELLSOUTH HAS NOT  
21 COMMITTED TO PROVIDING ITC^DELTACOM A DOWNLOAD  
22 OF THE RSAG DATABASE". PLEASE COMMENT.

23  
24 A. As stated in my direct testimony, BellSouth has made a written proposal  
25 to ITC^DeltaCom to provide a download of the RSAG at terms and

1 conditions stated in the proposal. BellSouth stands ready to meet with  
2 ITC^DeltaCom to negotiate with respect to RSAG if ITC^DeltaCom is  
3 still interested in pursuing its request. Attached as Rebuttal Exhibit  
4 RMP-1 is a copy of BellSouth's most recent correspondence to  
5 ITC^DeltaCom on the issue. To my knowledge, ITC^DeltaCom still has  
6 provided no feedback on the terms and conditions presented in the  
7 proposal.

8  
9  
10 Q. MR. THOMAS, ON PAGES 6-7, OF HIS TESTIMONY STATES THAT  
11 "THE FCC HAS FURTHER CONCLUDED THAT IN ORDER FOR  
12 BOCS TO DEMONSTRATE NONDISCRIMINATORY ACCESS TO  
13 OSS FUNCTIONS, A BOC MUST 'PROVIDE THE SAME ACCESS TO  
14 COMPETING CARRIERS THAT IT PROVIDES TO ITSELF.' BY  
15 REQUESTING THE RSAG INFORMATION, ITC^DELTACOM IS  
16 SIMPLY ASKING BELL SOUTH TO PROVIDE THE SAME ACCESS  
17 TO THE OSS INFORMATION THAT BELL SOUTH PROVIDES TO  
18 ITSELF." DO YOU AGREE?

19  
20 A. No. BellSouth's electronic interfaces provide CLECs with access to  
21 RSAG in substantially the same time and manner as BellSouth provides  
22 for its retail customers. BellSouth is not obligated to provide  
23 ITC^DeltaCom with anything more.

24  
25



1       **Issue 2(a)(ii) Should BellSouth be required to provide changes to**  
2       **its business rules and guidelines regarding resale and UNEs at**  
3       **least 45 days in advance of such changes being implemented and**  
4       **in a manner that is easily accessible?**

5  
6       Q.     ON PAGE 7 OF HIS TESTIMONY, MR. THOMAS DISCUSSES  
7             ITC^DELTACOM'S NEED FOR ADVANCE NOTICE OF CHANGES  
8             AND REVISIONS TO BELL SOUTH'S BUSINESS RULES AND  
9             GUIDELINES. PLEASE COMMENT.

10  
11     A.     As pointed out in my direct testimony, BellSouth has a well defined  
12             process in place which provides advance notice of changes to its  
13             business rules and guidelines, regarding resale and UNEs. Its written  
14             notifications are posted, on a daily basis, on an easily accessible web  
15             page. As a general rule, these postings are made thirty (30) days prior  
16             to the implementation of the change; however, there may be  
17             circumstances for legitimate reasons in which the 30-day timeframe is  
18             not met. BellSouth provides these notices in the interest of serving the  
19             CLECs, even though there is no legal or mandated obligation to provide  
20             any advance notification.

21  
22     Q.     MR THOMAS, ON PAGE 7 OF HIS TESTIMONY, COMPLAINS THAT  
23             THE CHANGE NOTIFICATION POSTED ON THE WEB PAGE  
24             "PROVIDES A GENERALIZED DESCRIPTION OF CHANGES  
25             BELL SOUTH HAS MADE TO THE BELL SOUTH ORDERING GUIDES.

1 IT IS VERY DIFFICULT TO DISCERN FROM THIS NOTIFICATION  
2 WHETHER A CHANGE WILL AFFECT A SYSTEM, A BUSINESS  
3 RULE OR BOTH.” DO YOU AGREE?  
4

5 No. The notification title provides a clear, concise description of the  
6 information contained in the notice. Notifications of interest, specific to  
7 the CLECs, contain the word “CLEC” as the first entry in the notification  
8 title on the web page. Furthermore, ITC^DeltaCom receives additional  
9 information concerning system changes via the Electronic Interface  
10 Change Control Process (EICCP).  
11

12 Q. ON PAGE 8 OF HIS TESTIMONY, MR THOMAS DISCUSSES A  
13 BUSINESS RULE CHANGE AFFECTING THE LPIC FIELD. PLEASE  
14 COMMENT.  
15

16 The field LPIC identifies the presubscription indicator code for the  
17 carrier the CLEC has selected for intralata 1+ calls. The valid entry of  
18 “NA” means Not Applicable and is used to indicate that the service does  
19 not require an LPIC. This entry was used in Tennessee prior to  
20 implementation of Intralata 1+ subscription.  
21

22 BellSouth’s Second Revised IntraLATA Toll Dialing Plan was filed with  
23 the TRA on February 5, 1999. The Second Revised Plan was  
24 approved by the TRA on February 8, 1999 in its Docket NO. 97-01399,  
25 to be effective on February 8, 1999. Therefore, BellSouth could not

1 provide advance notice and still implement intraLATA 1+ subscription  
2 on February 8, 1999. BellSouth provided the Intralata 1+ subscription  
3 notification on February 15, 1999.  
4

5 **Issue 3(m)**

6 ***What type of repair information should BellSouth be required to***  
7 ***provide to ITC^DeltaCom such that ITC^DeltaCom can keep the***  
8 ***customer informed?***

9  
10 Q. MR. THOMAS, ON PAGES 11-12 OF HIS TESTIMONY, DESCRIBES  
11 THE FUNCTIONALITY WHICH ITC^DELTACOM ALLEGES IS  
12 REQUIRED IN A MAINTENANCE AND REPAIR INTERFACE. DO  
13 BELLSOUTH'S MAINTENANCE AND REPAIR INTERFACES  
14 PROVIDE ITC^DELTACOM WITH THE FUNCTIONALITY REQUIRED  
15 TO ENABLE ITC^DELTACOM TO KEEP ITS CUSTOMERS  
16 INFORMED?

17  
18 A. Yes. As I've stated in my direct testimony, BellSouth provides  
19 ITC^DeltaCom with non-discriminatory access to its maintenance and  
20 repair OSS by providing the Trouble Analysis and Facilitation Interface  
21 ("TAFI") and the Electronic Communications Trouble Administration  
22 ("ECTA") Gateway. Among other things, these interfaces allow CLECs  
23 to enter customer trouble tickets into the BellSouth system, retrieve and  
24 track current status on all trouble and repair tickets, and receive an  
25 estimated time to repair on a real-time basis.

1

2 Q. MR. THOMAS, ON PAGE 12 OF HIS TESTIMONY, STATES THAT  
3 ITC^DELTACOM SHOULD BE ABLE TO "... RETRIEVE A LIST OF  
4 ITEMIZED TIME AND MATERIAL CHARGES AT THE TIME OF  
5 TICKET CLOSURE ..." FROM TAFI. PLEASE COMMENT.

6

7 A. Itemized time and material charges are not available in TAFI for  
8 BellSouth's own retail units or for CLECs. There is no requirement that  
9 BellSouth provide ITC^DeltaCom with functionality that it does not  
10 provide to itself.

11

12

13 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

14

15 A. Yes.

16

17

18

Parkey D. Jordan  
General Attorney

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675 West Peachtree Street  
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Telephone: 404-335-0794  
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October 14, 1999

Ms. Nanette Edwards  
Senior Manager-Regulatory Attorney  
ITC^DeltaCom  
700 Boulevard South, Suite 101  
Huntsville, AL 35802

Dear Nanette:

This is in response to your letter of October 5, 1999. While I will respond to your questions as best I can without information regarding ITC^DeltaCom's expectations and needs, I again urge you to schedule some time to sit down with us (whether in person or by conference call) to discuss RSAG. As I have told you previously, ITC^DeltaCom is asking for information which could vary depending upon the functionality you will need from RSAG.

With respect to your question on pricing, BellSouth has never quoted a price of \$50,000 to ITC^DeltaCom. During our negotiations meeting on August 13, 1999, I verbally quoted \$87,500 for the first download and \$500-\$1000 per month thereafter for subsequent downloads. I told you at that time that the estimate was rough as it was based upon information provided to another CLEC that had inquired about an RSAG download. The estimate of \$87,500 was offered to that CLEC based upon the fields of data requested and negotiated by that CLEC. However, if ITC^DeltaCom is interested in obtaining basic fields which BellSouth already placed in development, the price may decrease due to a decrease in development time. BellSouth and ITC^DeltaCom need to discuss ITC^DeltaCom's needs and negotiate the fields of data which will be provided in order to establish a definitive cost.

The cost for the RSAG download is based substantially on systems development. Analysis, design, construction and testing are estimated to require five to six man-months at a cost of approximately \$15,000 per man-month. Again, ITC^DeltaCom's

acceptance of only those fields already under development may decrease the man-hours required for development.

BellSouth cannot and will not disclose to ITC^DeltaCom requests of other specific CLECs. BellSouth has negotiated with one other CLEC for a download of the RSAG database. However, those negotiations were never concluded. BellSouth has not provided a download of RSAG to any other CLEC and is not in active negotiations to do so with any CLEC other than ITC^DeltaCom.

As you know from our discussions regarding release of CLEC directory listings to third party publishers, BellSouth develops systems and provides services based upon CLEC requests. If ITC^DeltaCom is the first and only CLEC requesting a service, it will be assessed the costs associated with BellSouth's development and implementation. As stated above, at this time, BellSouth is not in active negotiations with any other CLEC for a download of RSAG.

A license agreement is necessary for BellSouth to agree to a download of RSAG to ITC^DeltaCom. While information such as name and address is not proprietary, the database itself is. BellSouth has expended substantial resources to create a workable system which formats the information in a useable manner. BellSouth must protect its intellectual property, including copyright and trade secrets, if it releases the database to a third party. That database therefore is subject to the types of restrictions that would generally apply to any disclosure of intellectual property. The information contained in the RSAG database is available through LENS and TAG. The database itself will only be provided pursuant to a license agreement.

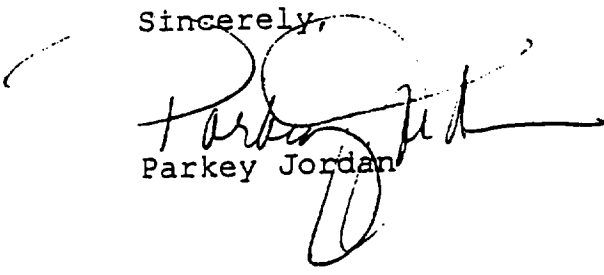
Attached to this letter is a description of fields which may be provided to ITC^DeltaCom (available fields are marked as "R"). The fields that are marked "P" contain BellSouth proprietary business information such as customer profiles, plans for development of BellSouth services, other carrier information and the like.

Again, if ITC^DeltaCom intends to purchase the RSAG download, the parties need to negotiate the fields, the pricing for the requested information and the terms of the license agreement. BellSouth has provided sufficient information for ITC^DeltaCom to evaluate its interest in BellSouth's proposal, but ITC^DeltaCom has provided no feedback on the proposed

license agreement, the language for the interconnection agreement or the terms of the proposal.

Please let me know when you would like to set up a meeting or conference call to discuss RSAG.

Sincerely,



Parkey Jordan

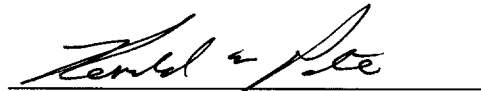
Attachment

AFFIDAVIT

STATE OF: Georgia  
COUNTY OF: Fulton

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Ronald M. Pate-Director-Interconnection Services, BellSouth Telecommunications, Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 99-00430 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 18 pages and 1 exhibit(s).



Ronald M. Pate

Sworn to and subscribed  
before me this 22<sup>nd</sup>  
day of October, 1999



NOTARY PUBLIC

**MICHEALE F. HOLCOMB**  
Notary Public, Douglas County, Georgia  
My Commission Expires November 3, 2001